

UNITED STATES DISTRICT COURT
District of Massachusetts (Western Division)

DIRECTV, INC.,

Plaintiff,

vs.

JOE SKARBEC,

Defendant

Case No.: 04-30218-KPN

**DEFENDANT'S ASSENTED TO
MOTION TO EXTEND TIME FOR
DISCOVERY UP TO AND INCLUDING
AUGUST 15, 2005 AND ALLOW FOR
THE LATE FILING OF RESPONSES TO
THE PLAINTIFF'S DISCOVERY AND
FOR A NEW DATE FOR CASE
MANAGEMENT CONFERENCE**

Now comes the Defendant JOE SKARBEC by and through counsel and hereby requests that this court extend the deadline for the taking of discovery from June 27, 2005 up to and including August 15, 2005.

In addition, the Defendant seeks leave to file responses to the Plaintiff's discovery requests late and on or before July 1, 2005.

Finally, the Defendant requests that the Case Management Conference originally scheduled for June 30, 2005 be rescheduled for a date certain following August 15, 2005.

In support of this motion the Defendant states that counsel for the Defendant encountered a substantial and prolonged medical emergency involving his daughter which involved multiple surgeries and encompassed the entire month May.

The Plaintiff assents to the relief requested herein and has reviewed this motion for form and content.

Pursuant to Local Rule 7.1(2) the parties certify that they have conferred and in good faith have agreed to the requested relief.

Dated: June 27, 2005

Respectfully Submitted

The Defendant, Joseph Skarbek

By:


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